

FILED BY *[Signature]* D.C.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

2005 NOV 23 PM 3:59

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT

CLERK, U.S. DISTRICT COURT  
WD OF TENNESSEE

REBECCA H. TREACE,

Plaintiff,

Civil Action No. 03-2409 M1/V

v.

MOTION GRANTED

UNUM LIFE INSURANCE COMPANY  
OF AMERICA,

Defendant.

*[Signature]*  
JON PHIPPS MACALLA  
U.S. DISTRICT JUDGE  
NOV. 29 2005  
DATE


**UNUM LIFE INSURANCE COMPANY OF AMERICA'S MOTION FOR  
EXTENSION OF TIME TO FILE ITS RESPONSE TO PLAINTIFF'S MOTION  
FOR SANCTIONS FOR DEFENDANT'S REFUSAL TO PRODUCE THE  
COMPLETE FILE IT MAINTAINED CONCERNING PLAINTIFF**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.2, counsel for Defendant, Unum Life Insurance Company of America ("Unum"), states that, in light of the impending trial of this matter, additional time is needed in which to file its Response to Plaintiff's Motion for Extension of Time to File Its Response to Plaintiff's Motion for Sanctions for Defendant's Refusal to Produce the Complete Claim File It Maintained Concerning Plaintiff. Unum hereby moves this Court for an Order extending the time within which Unum must respond, up to and including 20 days after the conclusion of the trial of this matter.

In support of this Motion, Unum relies upon its contemporaneously filed Memorandum in Support, Local Rule 7.2 (a)(1)(B) Certificate of Consultation, and the entire record in this cause.

WHEREFORE, premises considered, counsel for Unum requests that this Court extend the time within which Unum must file its Response to Plaintiff's Motion for Extension of Time to File Its Response to Plaintiff's Motion for Sanctions for Defendant's Refusal to Produce the Complete Claim File It Maintained Concerning Plaintiff, up to and including 20 days after the conclusion of the trial of this matter.

Respectfully submitted,

By:   
S. Russell Headrick (5750)  
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Attorneys for Defendant, Unum Life  
Insurance Company of America

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading has been sent via U.S. Mail, postage prepaid, to the following counsel of record on November 23, 2005:

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LEIGH M. CHILES



## Notice of Distribution

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Honorable Jon McCalla  
US DISTRICT COURT